

**IN THE UNITED DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

FUJIAN MINGTA TOYS CO. LTD.,)	
)	
)	
)	
Plaintiff,)	Case No. 1:24-cv-05625
)	
v.)	Honorable John Robert Blakey
)	
THE PARTNERSHIPS and)	
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE "A",)	
)	
Defendants.)	

Unopposed Motion for Extension of Time

Defendant Summidate-US ("Defendant") respectfully moves this Court for an extension of time, up to and including February 17, 2025, for Defendant to answer or otherwise respond in this matter. In support thereof, Defendant states as follows:

1. The current deadline for Defendant to answer or otherwise respond in this matter is January 17, 2025.

2. Plaintiff and Defendant have been conducting a good faith settlement negotiation, and additional time is needed for Defendant to explore settlement, or to conclude whether settlement is feasible and respond to Plaintiff's Complaint. Defendant submits that a short extension will not materially prejudice Plaintiff as no time has passed since the original response deadline and a short extension may help avoid unnecessary substantive motion practice.

3. Defendant respectfully requests this Court extend the date on which Defendant is to have filed response(s) to Plaintiff's Complaint, if ultimately necessary, to February 17, 2025.

4. This motion has been filed in good faith and is not interposed for purposes of delay.

5. This is the first motion for an extension filed by Defendant in this case.

6. Plaintiff has consented to a 30-day extension this time.

WHEREFORE, Defendant respectfully requests that this Court grant this motion and extend the deadline by which Defendant is to answer or otherwise respond to the Complaint in this matter, up to and including February 17, 2025.

Dated: January 16, 2025

Respectfully submitted,

/s/ Qin Zhuang
Qin Zhuang
Beijing Yunting Law Firm
16-18th Floor, Ruisai Building
126 Jianguo Road, Chaoyang
Beijing, PRC 100022
0086-155-1009-0593
zhuangqin@yuntinglaw.com

Counsel for Defendant

CERTIFICATE OF SERVICE

On January 16, 2025, I filed the foregoing document with the clerk of Court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the CM/ECF System, which will send notification of said filing to all counsel of record.

/s/ Qin Zhuang
Qin Zhuang